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May 16, 2007

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1 SUPREME COURT:

2 ALL COUNTIES WITHIN THE STATE OF NEW YORK

3 IN RE: NEW YORK CITY ASBESTOS LITIGATION

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7 DEPOSITION UNDER ORAL

VOLUME II

8 EXAMINATION OF

9 SALVATORE GITTO

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14 This Document Applies To:

15 SALVATORE GITTO

16 INDEX NO: 07/105033

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22 PRIORITY-ONE COURT REPORTING SERVICES, INC.

23 899 Manor Road

24 Staten Island, New York 10314

25 (718) 983-1234

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<p style="text-align: right;">Page 266</p> <p>1 Q. Did you assist in that project?</p> <p>2 A. To some extent, limited.</p> <p>3 Q. To what extent did you assist?</p> <p>4 A. I'm pretty sure we had a contractor work</p> <p>5 upstairs. My involvement was minimal.</p> <p>6 Q. Did you do any work in connection with</p> <p>7 that project at all?</p> <p>8 A. I'm sure I did some, yes.</p> <p>9 Q. Do you remember what that was?</p> <p>10 A. Maybe some little carpentry work.</p> <p>11 Q. Do you recall the name of the contractor</p> <p>12 who did that work?</p> <p>13 A. My father.</p> <p>14 Q. Did anybody else assist him?</p> <p>15 A. Maybe one of my brothers.</p> <p>16 Q. Do you have a specific recollection of</p> <p>17 that?</p> <p>18 A. I'm sorry?</p> <p>19 Q. Do you have a specific memory of one of</p> <p>20 your brothers helping him? Again, I just want to</p> <p>21 know what you do recall specifically.</p> <p>22 A. I'm sure some of the family members helped.</p> <p>23 Q. Do you recall who as you sit here today?</p> <p>24 A. No.</p> <p>25 Q. Do you know the names of any products</p>	<p style="text-align: right;">Page 268</p> <p>1 A. Working on small generators maybe, lighting</p> <p>2 fixtures.</p> <p>3 Q. Do you recall the manufacturers of any of</p> <p>4 that equipment?</p> <p>5 A. No.</p> <p>6 Q. Let's move on to your time at the</p> <p>7 Brooklyn Navy Yard. You were asked generally about</p> <p>8 the Lexington and the Oriskany earlier today. You</p> <p>9 said that you did not recall specific jobs that you</p> <p>10 performed on those ships. Do you believe that you</p> <p>11 were exposed to asbestos on those ships?</p> <p>12 A. I believe so.</p> <p>13 Q. Let's talk about the Lexington first.</p> <p>14 How is it that you believe that you were exposed to</p> <p>15 asbestos aboard the Lexington?</p> <p>16 A. I recall the type of work would have brought</p> <p>17 me into the engine rooms and the boiler rooms.</p> <p>18 Q. What type of work would that have been</p> <p>19 that would have brought you into those rooms?</p> <p>20 A. As previously discussed or whatever, involved</p> <p>21 the removal and installation of new equipment or old</p> <p>22 equipment, the layout of foundations and the repair</p> <p>23 of anything that was disturbed in order to gain</p> <p>24 access.</p> <p>25 Q. When you talk about repair of anything</p>
<p style="text-align: right;">Page 267</p> <p>1 that were used in connection with that construction</p> <p>2 project?</p> <p>3 A. No.</p> <p>4 Q. Again, was plastering work involved in</p> <p>5 that project at all, that you know of?</p> <p>6 A. Say again.</p> <p>7 Q. Plastering work, was that involved in</p> <p>8 that project at all?</p> <p>9 A. I think some small patching, yes.</p> <p>10 Q. Were you present when that was done?</p> <p>11 A. I don't recall.</p> <p>12 Q. Moving on to your time at the Textile</p> <p>13 High School for just a second, what did you study at</p> <p>14 that location?</p> <p>15 A. I'm sorry?</p> <p>16 Q. At the Textile High School, what did you</p> <p>17 study, just generally?</p> <p>18 A. Electrical technology.</p> <p>19 Q. Can you just describe for me generally</p> <p>20 what that meant?</p> <p>21 A. Study of electrical theory and applications.</p> <p>22 Q. Did it involve any type of hands-on work</p> <p>23 on any type of equipment?</p> <p>24 A. In a lab environment, yes.</p> <p>25 Q. What type of work would that be?</p>	<p style="text-align: right;">Page 269</p> <p>1 that was disturbed, are you talking about the access</p> <p>2 holes that you've been mentioning throughout the past</p> <p>3 couple of days?</p> <p>4 A. Right.</p> <p>5 Q. Do you recall how many engine rooms there</p> <p>6 were aboard the Lexington?</p> <p>7 A. I believe two.</p> <p>8 Q. Do you recall how many boiler rooms there</p> <p>9 were?</p> <p>10 A. I believe two.</p> <p>11 Q. Do you recall which of those engine rooms</p> <p>12 or boiler rooms you worked in?</p> <p>13 A. It would have been all of them.</p> <p>14 Q. How is it that you believe you were</p> <p>15 exposed to asbestos specifically in the engine room?</p> <p>16 A. Again, as similarly stated, there was</p> <p>17 equipment that was being installed and removed,</p> <p>18 uncovered, piping insulation being removed,</p> <p>19 reinstalled. Welding going on, burning going on.</p> <p>20 Fire protection, coverings. That type of work.</p> <p>21 Q. What type of equipment do you believe was</p> <p>22 removed?</p> <p>23 A. Variety of equipment; compressors, pumps.</p> <p>24 Q. Are you able to identify the manufacturer</p> <p>25 of the compressors that were aboard the Lexington at</p>

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1 that time?  
2 A. I can't identify compressors, I guess, but  
3 Ingersoll-Rand. That's about it. At this time, I do  
4 not recall too much more.  
5 Q. I understand you said more than once  
6 today that you identify compressors with  
7 Ingersoll-Rand. Do you have a specific recollection  
8 of the brand that was aboard the Lexington in the  
9 engine room?  
10 A. No.  
11 Q. How about the pumps that you believe were  
12 installed and removed on the Lexington only? Are you  
13 able to identify the manufacturer?  
14 A. Again, I believe Vickers was the manufacturer.  
15 Q. The piping insulation that was removed  
16 and replaced in the engine room, are you able to  
17 identify the brand of that insulation?  
18 A. No.  
19 Q. The welding that you just described that  
20 you believe caused you to be exposed to asbestos,  
21 what welding are you referring to?  
22 A. Welding of the foundation; welding of the  
23 hangers, brackets, supporting structure; welding of  
24 any patches or holes that were cut out.  
25 Q. Why were holes made on that particular

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1 ship in the engine room?  
2 A. To get access. In order to get access for the  
3 equipment, they didn't fit through a normal size  
4 hatch, hole, so they had to cut a hole in the  
5 bulkhead or something, allow the equipment to be  
6 passed through.  
7 Q. Do you have a specific recollection of  
8 equipment being passed through the hole of the  
9 Lexington?  
10 A. I think on all the ships, similar type of  
11 operation. The equipment was quite large, and the  
12 normal access ladders, hatches were made for human  
13 transportation, for humans to pass through, not large  
14 pieces of equipment.  
15 Q. Do you recall if you worked with anybody  
16 in the engine room aboard the Lexington performing  
17 the work that you just described?  
18 A. I'm sure I did.  
19 Q. Do you recall the names of anybody in  
20 particular?  
21 A. No.  
22 Q. Do you recall who your supervisor was  
23 when did you that work?  
24 A. No.  
25 Q. With respect to the boiler rooms aboard

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1 the Lexington, do you believe that you were exposed  
2 in the same fashion as you've already described with  
3 respect to the engine rooms on this ship?  
4 A. Yes.  
5 Q. Again, are you able to specifically  
6 identify the manufacturer of any equipment located  
7 within those engine rooms?  
8 A. And on the boilers I remember Babcock &  
9 Wilcox.  
10 Q. Was there any other type of equipment in  
11 that room that you believe you were exposed to  
12 asbestos from?  
13 A. Again, there was a lot of other equipment in  
14 there, compressors, pumps, valves.  
15 Q. Again, are you able to testify with  
16 certainty the manufacturers of those pieces of  
17 equipment aboard the Lexington in the boiler room?  
18 A. No.  
19 Q. Let's move on to the Oriskany. I have  
20 the same questions for you. How is it that you  
21 believe you were exposed to asbestos aboard that  
22 ship?  
23 A. Similarly.  
24 Q. Was there anything different about how  
25 you're claiming exposure on the Oriskany as opposed

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1 to the Lexington?  
2 A. Basically not.  
3 Q. Again, did you work in both the engine  
4 room and the boiler rooms in that ship?  
5 A. Yes.  
6 MR. NOVAKIDIS: I'm just going to object  
7 to the last question as foundation.  
8 Q. Are you able to testify with certainty as  
9 to the names of the manufacturers of any of the  
10 equipment on those spaces on the Oriskany?  
11 MS. WAYNE: Form. Foundation.  
12 A. No.  
13 Q. You were never a licensed machinist or  
14 millwright, correct?  
15 A. No.  
16 Q. You had no training with respect to the  
17 maintenance of compressors or pumps?  
18 A. No.  
19 Q. True?  
20 A. True.  
21 Q. In your Interrogatories, there's  
22 reference made to both Worthington pumps and  
23 compressors aboard various vessels. Do you recall  
24 that?  
25 A. I believe so, yes.

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1 talking about?

2 Q. On the FDR.

3 A. I would see where the pump was supposed to be

4 located by drawing or spec, check it out that it was

5 there. If it wasn't there, remove it and put it in

6 the proper location.

7 Q. Would you personally remove it?

8 A. The foundation itself, not the pump. The pump

9 itself was handled by machinists. The foundation was

10 my responsibility.

11 Q. Do you believe you were exposed to

12 asbestos from the Vicker pumps on the FDR?

13 A. Yes.

14 Q. How do you believe were exposed to

15 asbestos from these pumps?

16 A. Lot of these pumps had asbestos pipe covering

17 that needed to be removed and replaced and disturbed.

18 They were ripped. They were burnt. They gave off

19 fumes.

20 Q. Any other ways?

21 A. That's it.

22 Q. Where is this asbestos pipe covering

23 located?

24 A. I'm sorry? Where?

25 Q. The pipe covering you're referring to,

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1 where is it located?

2 A. Where?

3 Q. On the pipes or the pump itself?

4 A. On both.

5 Q. On both?

6 A. Yes.

7 Q. What was the purpose of the covering that

8 was located on the Vicker pump?

9 A. Asbestos covering?

10 Q. Yes.

11 A. For protection.

12 Q. Protection from what?

13 A. Outside environment, sparks. There's

14 construction activity going on all around. Sparks go

15 flying, hot molten metal. People were bumping into

16 these things. Just generally protection.

17 Q. So, you said people were bumping into

18 these things. Was it like a cushion?

19 A. No.

20 Q. Can you describe the covering, the

21 asbestos covering that was on the pump, the Vickers

22 pump?

23 A. Blanket form, I guess, brownish in color.

24 Q. Do you recall the texture of the blanket?

25 A. Not really, no.

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1 Q. Do you know who installed the covering,

2 that blanket covering on the Vicker pump?

3 A. I'm really not hearing you. I'm sorry.

4 Q. Do you know who installed the asbestos

5 blanket over the Vicker pump?

6 A. Did I ever?

7 Q. Do you know who installed it?

8 A. Oh, the blankets. They were the

9 responsibility of the pipe coverers and the ladders, I

10 guess they call them. A specific trade.

11 Q. Do you associate the blanket covering on

12 the Vicker pumps to old pumps on the FDR or newly

13 installed pumps?

14 A. Old.

15 Q. Did the old pumps and the newly installed

16 pumps have the same type of blanket over them?

17 A. Similar.

18 Q. Was there a certain type of Vicker pump

19 that was covered as opposed to another type of Vicker

20 pump that was covered with another asbestos blanket?

21 A. I have no idea.

22 Q. You also identified Vicker pumps as being

23 located on the U.S.S. Lexington in the boiler rooms

24 and equipment room. Do you have a specific

25 recollection of seeing a Vicker pump on the U.S.S.

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1 Lexington?

2 A. There were pumps all over. Specifically, it

3 would be difficult for me to say I saw one of their

4 pumps right there, but there were pumps on board.

5 Q. I'm just asking as you sit here today, do

6 you have a specific recollection of seeing a Vicker

7 pump on the U.S.S. Lexington?

8 A. No.

9 Q. Do you recall whether or not Vicker pumps

10 were in any other compartment on the U.S.S. Lexington

11 besides the boiler room and the equipment room?

12 A. I don't have a recollection.

13 Q. When you worked on the U.S.S. Lexington,

14 what was your title?

15 A. Can you give me a time frame?

16 Q. Whenever you worked on the U.S.S.

17 Lexington.

18 MR. BLOCK: Why don't you ask the full

19 question again so it's clear. Maybe a little

20 louder.

21 Q. Do you recall what year or years you

22 worked on the U.S.S. Lexington?

23 MR. BLOCK: Objection to the extent that

24 it's been asked and answered, but you can go

25 ahead.



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<p style="text-align: right;">Page 364</p> <p>1 pumps had hoses connected to them?</p> <p>2 A. Hoses?</p> <p>3 Q. Hoses.</p> <p>4 A. Yes.</p> <p>5 Q. Were there any markings on those hoses?</p> <p>6 A. Not that I recall.</p> <p>7 Q. Do you associate a particular color to</p> <p>8 these hoses?</p> <p>9 A. Most of the hoses were black.</p> <p>10 Q. With regard to the Vicker pumps on the</p> <p>11 U.S.S. Lexington, how do you believe you were exposed</p> <p>12 to asbestos from these pumps?</p> <p>13 A. In a similar manner described before.</p> <p>14 Involved with the inspection, location and</p> <p>15 relocation, if necessary, foundation.</p> <p>16 Q. Are you finished --</p> <p>17 MR. BLOCK: He's not finished if you</p> <p>18 interrupt him in the middle of a word.</p> <p>19 Read back the answer up to the point</p> <p>20 where Mr. Gitto was interrupted, please.</p> <p>21 (Whereupon, the referred to question and</p> <p>22 answer were read back by the court reporter.)</p> <p>23 A. That's about the answer.</p> <p>24 Q. In regard to all these different</p> <p>25 activities, inspection, location, relocation and</p>	<p style="text-align: right;">Page 366</p> <p>1 Q. And that would burn the asbestos?</p> <p>2 A. Yes.</p> <p>3 Q. That was in the covering?</p> <p>4 A. Yes.</p> <p>5 Q. Besides the covering that was on the</p> <p>6 pulling pump, do you recall any other ways that you</p> <p>7 were exposed to asbestos from Vicker pumps on the</p> <p>8 U.S.S. Lexington?</p> <p>9 A. Just general handling of the covering and the</p> <p>10 insulation that was on there. They took it on and</p> <p>11 off.</p> <p>12 Q. Is the covering you referred to and</p> <p>13 insulation the same thing, or are they different</p> <p>14 materials that were on the pump or the pipes?</p> <p>15 A. Pretty much the same thing.</p> <p>16 Q. Do you know what the difference is?</p> <p>17 A. No.</p> <p>18 Q. Do you have a difference in mind between</p> <p>19 the insulation and the covering that was on the pump?</p> <p>20 A. Generally, I think, again, covering wraps</p> <p>21 around the pipe itself (indicating). On the pump, it</p> <p>22 would be laid on top of the pump or attached in some</p> <p>23 manner to the pump.</p> <p>24 Q. You're making a distinction regarding the</p> <p>25 pipes leading to the pump, that they were covered as</p>
<p style="text-align: right;">Page 365</p> <p>1 foundation, what was the source of your exposure to</p> <p>2 asbestos?</p> <p>3 A. What was my?</p> <p>4 Q. What was the source of your exposure to</p> <p>5 asbestos?</p> <p>6 A. In order to relocate it, foundation or a pump,</p> <p>7 they had to remove the pipe covering. It was often</p> <p>8 not -- it was often burnt off, creating residue,</p> <p>9 smoke, fibers in the air, in the compartment.</p> <p>10 Q. And this covering was on pipe and the</p> <p>11 pump?</p> <p>12 A. Yes.</p> <p>13 Q. Can you describe this covering that was</p> <p>14 on the pump?</p> <p>15 A. It was pipe covering. It was two halves</p> <p>16 usually strapped together with a metal band.</p> <p>17 Q. Do you associate a color to that</p> <p>18 covering?</p> <p>19 A. Generally a brown.</p> <p>20 Q. And you believe this covering consisted</p> <p>21 of asbestos?</p> <p>22 A. Yes.</p> <p>23 Q. If it consisted of asbestos, how did they</p> <p>24 burn it off?</p> <p>25 A. An acetylene torch.</p>	<p style="text-align: right;">Page 367</p> <p>1 opposed to how the pump itself was covered, correct?</p> <p>2 A. Right.</p> <p>3 Q. Can you describe how the pump itself was</p> <p>4 covered?</p> <p>5 A. Again, with this blanket. It might have some</p> <p>6 sort of attaching screws, something to hold it in</p> <p>7 place.</p> <p>8 Q. And this is the type of covering that was</p> <p>9 on a Vickers pump on the U.S.S. Lexington, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Was this covering on both the old pumps</p> <p>12 and the newly installed pumps?</p> <p>13 A. Yes.</p> <p>14 Q. Was there any difference between the</p> <p>15 covering that was used on the older pumps that were</p> <p>16 removed and the new pumps that were installed?</p> <p>17 A. I don't recall. I don't recall.</p> <p>18 Q. I'm just going to switch gears a second</p> <p>19 and ask you about Vicker valves. You previously</p> <p>20 testified that you assorted Vicker valves to the</p> <p>21 U.S.S. Hornet, the U.S.S. Franklin D. Roosevelt and</p> <p>22 the U.S.S. Lexington. Do you recall that testimony?</p> <p>23 A. Those were ships that I worked on, yes.</p> <p>24 Q. Do you associate the Vicker valves to any</p> <p>25 other ships or locations?</p>

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1 A. Control the flow of fluid.  
2 Q. Is there a difference in your mind  
3 between the Vickers valves and the Vickers pumps?  
4 A. Valves control the flow of fluid. The pumps  
5 raise or lower the pressure.  
6 Q. Do you recall what type of fluid flowed  
7 through these Vickers valves on the U.S.S. Hornet?  
8 A. There is a variety of anything from fuel oil  
9 to drinking water.  
10 Q. Do you believe you were exposed to  
11 asbestos from the Vicker valves on the U.S.S. Hornet?  
12 A. Yes.  
13 Q. How do you believe that occurred?  
14 A. By my, again, similar as to what I testified  
15 to before, that I was involved with the inspection,  
16 relocation, if necessary, of foundations for these  
17 valves, which encompassed and removing and  
18 reinstalling valve covering, pipe coverings.  
19 Q. What were the valves covered with?  
20 A. I'm sorry?  
21 Q. What were the Vicker valves covered with?  
22 A. What were the Vicker valves covered with?  
23 Q. Yes.  
24 A. Protective covering, you're talking about?  
25 We're talking about protective covering.

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1 Q. Let me ask that again. Were the Vicker  
2 valves covered with anything?  
3 A. For protection, they were covered with  
4 asbestos blankets.  
5 Q. Is it your testimony that you were  
6 exposed to asbestos when these asbestos blankets that  
7 were over the Vicker valves were removed or replaced?  
8 A. Them and the pipe covering.  
9 Q. The pipe covering that you're referring  
10 to, was that only on the pipes or also on the valves?  
11 A. Certainly was on the pipes. I don't recall  
12 specifically on the valves themselves, but probably  
13 were.  
14 Q. You earlier testified, I believe, in  
15 regard to the Vicker pumps, that one of the ways to  
16 get the covering off the pumps was a burning process.  
17 Was that burning process used to remove the asbestos  
18 blankets if these asbestos blankets were on a pump or  
19 a valve?  
20 A. I don't specifically remember seeing them used  
21 to burn off blankets, but it wouldn't have surprised  
22 me if they had. They just went in there, and it was  
23 kind of a destructive process, get rid of the old  
24 ones and start building from the ground up.  
25 Q. Besides the asbestos blanket and the pipe

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1 covering that was on the pipes, was there any other  
2 way you believe you were exposed to asbestos from a  
3 Vickers valve on the U.S.S. Hornet?  
4 A. No.  
5 Q. If I go to the U.S.S. FDR and the U.S.S.  
6 Lexington and ask you about the Vicker valves on each  
7 of those ships, would your description of these  
8 valves be different than your description of the  
9 Vicker valves on the U.S.S. Hornet?  
10 A. It would be very similar.  
11 Q. How would they be different?  
12 MR. BLOCK: If at all.  
13 A. Maybe the way the piping configurations hooked  
14 up, the runs of the pipe or something might be  
15 different.  
16 Q. On the U.S.S. Hornet, do you recall a  
17 specific piping configuration that you associate to  
18 the Vicker valves?  
19 A. No.  
20 Q. Do you recall a specific piping  
21 configuration that you associate to the Vicker valves  
22 on the FDR?  
23 A. No.  
24 Q. And the same question for the U.S.S.  
25 Lexington?

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1 A. No.  
2 Q. Do you recall whether the sizes that you  
3 described for the Vicker valves on the U.S.S. Hornet  
4 were the same range of sizes that you would see on  
5 the FDR and the U.S.S. Lexington?  
6 A. Yes, pretty much so.  
7 Q. Is your testimony the same or similar as  
8 to how you were exposed to asbestos from the Vicker  
9 valves on the FDR and the Lexington in comparison to  
10 your testimony with the U.S.S. Hornet?  
11 A. Similar-type work was done, yes, similar  
12 exposure.  
13 Q. By that, you would be exposed to asbestos  
14 from the asbestos blankets on the Vicker valves and  
15 the pipe covering on the pipes assorted to the Vicker  
16 valves?  
17 A. Yes.  
18 Q. Are all the Vicker valves covered with an  
19 asbestos blanket?  
20 A. Some were, some weren't.  
21 Q. Do you know what the reason would be that  
22 some Vicker valves would not be covered with an  
23 asbestos blanket?  
24 A. They may have been removed for some reason  
25 that I have no idea what it would be.

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<p style="text-align: right;">Page 376</p> <p>1 Q. What's the basis for you saying that some 2 were and some weren't with regard to the Vicker 3 valves and the asbestos blanket being over them? 4 A. Repeat that. 5 Q. What's your basis for saying that some 6 Vicker valves were covered with asbestos blanket and 7 some were not? 8 A. Visual observation. 9 Q. Do you recall what ships you saw Vicker 10 valves not covered with an asbestos blanket? 11 A. No. 12 Q. Is it also true for the Vicker pumps, 13 that some were covered with an asbestos blanket and 14 some were not? 15 A. Yes. 16 Q. Do you recall what ships you saw that a 17 Vickers pump was not covered with an asbestos 18 blanket? 19 A. No. 20 Q. Besides the asbestos blanket over the 21 Vickers valve and the pipe covering connected to the 22 valve -- 23 A. It's either my ears or you're speaking low. 24 Q. Sorry. Besides the asbestos blanket 25 covering the Vickers valves on the U.S.S. Hornet,</p>	<p style="text-align: right;">Page 378</p> <p>1 you have listed on your Chart A. What's the basis 2 for associating cylinders to the name Vickers? 3 A. Again, the same as the previous answer. I 4 have no basis at this point. 5 Q. Okay. 6 MR. STEINBAUER: That's all the questions 7 I have now. Thank you. 8 THE WITNESS: Thank you. 9 10 11 CROSS-EXAMINATION BY 12 MR. CHAO: 13 Q. Good morning, Mr. Gitto. 14 A. Good morning. 15 Q. My name is Brendan Chao. I'm of counsel 16 for Northrup Grumman. 17 MR. CHAO: Just for the record, we want 18 to assert an objection to the production of 19 three manuals at 9:45 this morning, and I'll 20 just identify the manuals by their cover. The 21 first one is a green, three-ring binder called 22 "Grumman Safety Bulletins Manual." 23 The second one is a black binder, 24 multiple-ring binder called "Quality Control 25 Laboratory," entitled "Non-destructive Test</p>
<p style="text-align: right;">Page 377</p> <p>1 U.S.S. FDR and the U.S.S. Lexington, are there any 2 other ways that you believe you were exposed to 3 asbestos from a Vicker valve? 4 A. No. 5 Q. Do you associate any other type of 6 equipment with the name Vickers? 7 A. No. 8 Q. Listed under your Chart A, under 9 "Equipment," you have "Vickers" listed, and you have 10 "motors, valves and cylinders." Do you associate 11 motors, valves and cylinders with Vickers? 12 A. Now that you read it, I could associate it, 13 yes. 14 Q. We talked about the valves. What motors 15 do you associate to Vickers? 16 MR. BLOCK: Objection to form. 17 A. None that I can specifically point out. 18 Q. So, what's the basis for your associating 19 a motor, that piece of equipment to the name Vickers? 20 A. Any identifying plaque or ID that might be on 21 a piece of equipment. 22 Q. But as you sit here today, do you know 23 what the basis for that connection is? 24 A. No. 25 Q. The same question for the cylinders that</p>	<p style="text-align: right;">Page 379</p> <p>1 Manual." 2 The third manual is a blue, three-ring 3 binder entitled, "Quality and Safety 4 Operations, Military Space Quality 5 Procedures." 6 Let's have these marked. 7 (Whereupon, the referred-to binders were 8 marked Defendant's Exhibits 2, 3 and 4 for 9 Identification by the court reporter.) 10 MR. CHAO: We want to preserve our right 11 to further depose the witness based on a more 12 detailed examination of Defendant's 2 through 13 4. 14 MR. BLOCK: You can reserve any rights 15 you want. We obviously object. Just for the 16 record, these are Grumman's materials. So, 17 these aren't something that would not have 18 been available for review for Grumman. They 19 are marked "Grumman." They're Grumman 20 material. 21 MR. DIMARCO: Off the record. 22 (Whereupon, an off-the-record discussion 23 was held.) 24 Q. Mr. Gitto, you previously testified you 25 worked in essentially two capacities while you worked</p>